

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

MARTIN SMOLOWITZ, on Behalf of Himself : CASE NO. 03 cv 12613 RCL
And All Others Similarly Situated, :

Plaintiff, :

v. :

IBIS TECHNOLOGY CORP, :
and MARTIN J. REID, :

Defendants. :

FRED DEN, on Behalf of Himself : CASE NO. 04 cv 10060 RCL
And All Others Similarly Situated, :

Plaintiff, :

v. :

IBIS TECHNOLOGY CORP, :
and MARTIN J. REID, :

Defendants. :

JEFFREY WEINSTEIN, on Behalf of Himself : CASE NO. 04 cv 10088 RCL
And All Others Similarly Situated, :

Plaintiff, :

v. :

IBIS TECHNOLOGY CORP, :
and MARTIN J. REID, :

Defendants. :

MOTION OF MARTIN SMOLOWITZ AND GEORGE HARRISON
FOR CONSOLIDATION, APPOINTMENT OF LEAD PLAINTIFF, AND
FOR APPROVAL OF LEAD PLAINTIFF'S CHOICE OF COUNSEL

[Additional captions on the following page]

GEORGE HARRISON, on Behalf of	:	
Himself And All Others Similarly Situated,	:	CASE NO. 04 cv 10286 RCL
	:	
Plaintiff,	:	
v.	:	
	:	
IBIS TECHNOLOGY CORP,	:	
and MARTIN J. REID,	:	
	:	
Defendants.	:	

ELEANOR PITZER, on Behalf of	:	
Herself And All Others Similarly Situated,	:	CASE NO. 04 cv 10446 RCL
	:	
Plaintiff,	:	
v.	:	
	:	
IBIS TECHNOLOGY CORP,	:	
and MARTIN J. REID,	:	
	:	
Defendants.	:	

Martin Smolowitz and George Harrison, upon their Memorandum of Law in Support of the Motion and all prior papers and proceedings herein, hereby move for an Order: (i) consolidating the above-captioned related actions pursuant to Fed. R. Civ. P.42(a) and 15 U.S.C. §78u-4(a)(3)(B)(ii); (ii) appointing Martin Smolowitz and George Harrison as Co-Lead Plaintiffs in this action pursuant to 15 U.S.C. §78u-4(a)(3); and (iii) approving their selection of the Law Offices Bernard M. Gross, P.C. and Wolf Haldenstein Adler Freeman & Herz LLP as Co-Lead Counsel, and Shapiro Haber & Urmey as Liaison Counsel in this litigation pursuant to 15 U.S.C. §78u-4(a)(3)(B)(v).

A form of proposed Order is submitted herewith.

Dated: Boston, MA
March 5, 2004

Respectfully submitted,

/s/ Theodore M. Hess-Mahan
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